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From: Wolf, Steven H CIV USARMY CENAE (US)
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Groher-Wolf Comments on 20170629 Phase III report.docx

Hi Dave, attached are comments on the Aerovox Phase III from Dan Groher and myself. There is an additional comment noted below that might be relevant, but as Dan and I did not review the entire plan in detail, we weren't sure if it was addressed somewhere in the document,

One of the comments on the 2016 Phase III was that there was no mention of coordination with the EPA on the integration of the two remedial efforts. As far as I can tell, the only mention in the revised version was in Section 5.3.3

"Under integration with facility operations, there are no existing Site operations or activities associated with the current Aerovox Site itself; however, there will be coordination with EPA on the planned NBH Superfund dredging work and coordination with the City on the planned Riverwalk. More detailed evaluation of the relative comparative implementability of the OU3 alternatives in terms of EPA's planned harbor remediation is not possible because at this time EPA has not completed and is not able to provide specific plans for the methods or timing of their work. Again, there are no ongoing activities at the former Aerovox facility that would be impacted by any of the alternatives. All the alternatives will require ongoing operation and maintenance. All of the alternatives in theory could be constructed either using an integrated approach in coordination with EPA, or in advance of EPA's efforts and all the alternatives have potential for adverse impact or limited success until EPA completes the cleanup of the Aerovox shoreline portion (impacted sediment and DNAPL) of the NBH NPL site. Thus, none of these factors are differentiators. Rather, a point was given to those alternatives which provide a hard vertical barrier wall along the shoreline since this would provide the EPA cleanup (whenever and however it occurs) with a definitive, solid structural surface along the former Aerovox facility shoreline."

I could not find any discussion about what happens to the 25 ft strip between the proposed PRB and the existing boundary except for the shallow (to peat layer) and deeper in the northeast corner. There's a lot of remaining length of the proposed PRB that would pass through additional area defined in the Phase III as "probable DNAPL zone"

- Steve (and Dan)

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